

Kevin S. Sinclair, NV Bar No. 12277
ksinclair@sinclairbraun.com
SINCLAIR BRAUN LLP
16501 Ventura Blvd, Suite 400
Encino, California 91436
Telephone: (213) 429-6100
Facsimile: (213) 429-6101

Attorneys for Defendant
NORTH AMERICAN TITLE INSURANCE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE
PER L.R. IA 11-1(b)

Janet Trost, Esq.
501 S. Rancho Drive
Suite H-56
Las Vegas, Nevada 89106

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DEUTSCHE BANK NATIONAL TRUST
COMPANY,

Plaintiff,

vs.

NORTH AMERICAN TITLE INSURANCE
COMPANY,

Defendant.

Case No.: 2:22-cv-00547-GMN-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO REPLY IN
SUPPORT OF MOTION TO DISMISS;
AND OPPOSE MOTION TO AMEND,
(ECF NOS. 41, 50)**

FIRST REQUEST

COMES NOW defendant North American Title Insurance Company (“North American”) and plaintiff Deutsche Bank National Trust Company (“Deutsche Bank”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On March 5, 2024, North American filed its motion to dismiss Deutsche Bank’s complaint (ECF No. 41) pursuant to the Court’s February 21, 2024 Order (ECF No. 40);

2. On April 2, 2024, Deutsche Bank filed its opposition to North American’s motion to dismiss (ECF No. 49) and motion to amend (ECF No. 50);¹

¹ Deutsche Bank also filed countermotion for partial summary judgment on April 2, 2024. (ECF No. 51)

3. On April 4, 2024, the Ninth Circuit Court of Appeals issued a memorandum decision in *Wells Fargo Bank, N.A. v. Commonwealth Land Title Insurance Company*, Ninth Cir. Case No. 19-16181, affirming the district court's grant of summary judgment to the title insurer in that action;

4. Counsel North American requests a two (2) week extension of North American's deadline to reply in favor of its motion to dismiss (ECF No. 41) and a one (1) week extension of its deadline to oppose Deutsche Bank's motion to amend (ECF No. 50) such that both motions shall be due on April 23, 2024 (which is also North American's deadline to oppose Deutsche Bank's counter-motion (ECF No. 51)) so that the Parties can analyze the impact of the *Wells Fargo* decision on the instant action, including exploring the possibility of negotiating a settlement of this action in order to conserve the Court's resources.

5. This is the first request for an extension made by counsel for North American, which is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED that North American's deadlines to reply in support of its motion to dismiss (ECF No. 41) and oppose Deutsche Bank's motion to amend (ECF No. 50) shall be extended through and including April 23, 2024.

Dated: April 9, 2024

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair

KEVIN S. SINCLAIR

Attorneys for Defendant

NORTH AMERICAN TITLE INSURANCE
COMPANY

Dated: April 9, 2024

WRIGHT FINLAY & ZAK, LLP

By: /s/-Yanxiong Li

YANXIONG LI

Attorneys for Plaintiff

DEUTSCHE BANK NATIONAL TRUST
COMPANY

IT IS SO ORDERED.

Dated this 10 day of April, 2024.



HON. GLORIA M. NAVARRO
DISTRICT COURT JUDGE